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Department of Environmental Conservation
Waste Management Division
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June 13, 2011

THOMAS BADOWSKI
INTERSTATE WASTE SERVICES
19 KAISER DR
WATERBURY, VT 05676

RE: Sites Management Activity Complete, 2-8 Bay Street, SMS #2010-4049, St. Johnsbury, VT

Dear Mr. Badowski:

The Sites Management Section (SMS) has reviewed the January 5, 2011 report titled, "2-8 Bay Street, St. Johnsbury, Soil Investigation Report, November 2010, St. Johnsbury, Vermont" prepared by Environmental Compliance Services (ECS) for a soil test pit investigation conducted at the above referenced property on November 29, 2010. The SMS also reviewed information contained in the site file and, with respect to the April 27, 2010 report of contaminated soils makes the Sites Management Activity Complete (SMAC) determination described further below:

- During the 2009 property transaction screening of the above site, a sump/floor drain containing soil with total petroleum hydrocarbon levels (TPH) exceeding 1000 mg/kg was noted by ECS. The December 17, 2009 HAS letter report, 'Confirmation of Phase I Environmental Remediation Action Items, Bay Street Property, St. Johnsbury, VT' was also submitted for review. An Initial Site Investigation of the floor drain and a previously removed underground storage tank (UST) was required.
- Six soil borings were advanced; three of these were completed as groundwater monitor wells. All soil borings were field screened for volatile organic compounds (VOCs) using a photoionization detector and no VOCs were detected. The 3 newly installed monitor wells, 2 existing monitor wells, and one soil location were sampled for VOCs by EPA Method 8260; no VOCs were detected. The soil sample was also analyzed for TPH. TPH was found at 103 mg/kg. This is below the 1000 mg/kg level that the SMS uses as guidance for industrial properties.
- The site is an old industrial property bordered by Bay Street to the west, the Portland Street Bridge to the north, the Passumpsic River to the east, and additional industrial properties to the south. All buildings have been removed and only foundations remain on site. According to the report the property has been used for furniture storage, woodworking, auto sales and repair, a paint shop, and a trucking garage. The SMS was also able to review additional historical maps and identified a steam laundry and storage battery shop as additional property uses. Three underground gasoline tanks were shown on these maps associated with the former creamery, auto sales and repair shops, and laundry. The SMS requested additional investigation of potential abandoned USTs and lead contaminated soil.



Over

- On November 29, 2010 an east-west trench along the northern property boundary (Portland Street Bridge) was excavated to search petroleum impacted soil and USTs depicted on 1919 and 1942 Sanborn fire insurance maps. Soil samples were field screened for VOCs using a photoionization detector and none were detected. No odors or stained soil were reported. Miscellaneous fill consisting of brick, wood, coal slag, glass, and non-native gravel, sand, and boulders was noted, however no USTs were found. Two soil samples were analyzed for lead and it was found at 2.9 and 39 mg/kg, which is below the EPA remedial screening level of 800 mg/kg for industrial soils.
- Although requested by the SMS, investigation of potential USTs identified in Sanborn maps along Bay Street and the western property boundary, was declined by Interstate Waste Services. It was unclear if the tanks depicted on the Sanborn maps were on the subject property or if they are still present.
- The five groundwater monitor wells were properly closed to eliminate possible conduits for contaminant migration into the subsurface.

Based on the above, the SMS is assigning this site a Site Management Activity Completed designation. This SMAC designation does not release Interstate Waste Services of any past or future liability associated with the reported contamination onsite. It does, however, mean that the SMS is not requesting any additional work in response to the contamination discovered during property transaction screening at the 2-8 Bay Street property. SMAC designation is a determination by the SMS that the investigated conditions summarized above and further described in the site file, no longer constitute an unacceptable risk to human health and the environment under the property's current use. The information in the site file was submitted by the Interstate Waste Services or on their behalf and has not necessarily been independently verified by the SMS. This SMAC designation is not an endorsement by the SMS that the standard of All Appropriate Inquiry has been met for the entire property or for all conceivable future uses of this property.

Please feel free to call with any questions.

Sincerely,



Chuck Schwer
Section Chief, Sites Management Section

CC: St. Johnsbury Selectboard
St. Johnsbury Health Officer
DEC Regional Office (by e-mail)
Elizabeth Erickson, ECS (by e-mail)
Tom Murphy, ECS (by e-mail)